

THE STATE OF SOUTH CAROLINA
Public Service Commission

YORK COUNTY, SOUTH CAROLINA

Docket No.: 2018-358-WS
VERIFIED APPLICATION OF CAROLINA WATER SERVICE, INC. FOR APPROVAL OF ANNUAL RATE
ADJUSTMENT MECHANISMS AND PETITION FOR ACCOUNTING ORDER TO DEFER EXPENSES

YORK COUNTY PETITION TO INTERVENE AS A PARTY OF RECORD

York County, a body politic and political subdivision of the State of South Carolina, with a significant number of CWS/Blue Granite customers residing in the County, moves to join this action as a Party of Record entitled to receive all motions, briefs, all correspondence, and all offers of settlement among the parties.

York County seeks to intervene and opposes this application for the following reasons:

1. RATE MECHANISM TO HAVE AN IMPACT UPON YORK COUNTY CITIZENS. To the extent this case resolves the request for a "Pass Through" mechanism on a customer regional basis or a state-wide "rate adjustment mechanism" York County would like to afford itself an opportunity to address the distinction and the direct impact each may have upon CWS/Blue Granite customers in York County.
2. UTILITY RATES WOULD RISE WITHOUT ADEQUATE NOTICE TO CUSTOMERS OR ENOUGH TIME FOR CUSTOMERS TO REACT. According to the schedule set out within Carolina Water Service's application, customers are to be given only a 30-day notice of proposed rate increases, from May 1 to June 1 of each year. Without a public hearing, or further opportunity to comment upon rate increases, customers would effectively be precluded from the decision-making process.

If this proposal were implemented as presented, customers will need to have some alternative forum for comments, either by the Office of Regulatory Staff, the Consumer Advocate's Office, or the Commission itself. Customers would need Notice of proposed increases and additional time to comment upon proposed rate increases.

3. THE PROPOSED MECHANISM MAY BYPASS OR SHORTEN AUDITING BY THE OFFICE OF REGULATORY STAFF. Customers rely on auditing and review by the South Carolina Office of Regulatory Staff. Allowing the ORS limited time to review and audit the utility's expenses (from March 1 to April 15 of each year) would not work in the customers' best interests.

4. CUSTOMERS GIVEN FEWER OPPORTUNITIES TO ADDRESS PROBLEMS. Historically, customers have used rate cases to address serious issues with the water/sewer utility service and infrastructure. For example, when York County CWS customers have concerns with the provision of water/sewer service, concerns with water and its perceived quality/effects, and water and sewer rates themselves invite question, York County customers have utilized rate cases to address these issues with the Commission. An annual rate adjustment mechanism may preclude important dialogue from York County citizens.

Respectfully submitted by Counsel representing York County,

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